

**LOCAL PLAN FOR WYRE FOREST DISTRICT**

**STATEMENT OF COMMON GROUND**

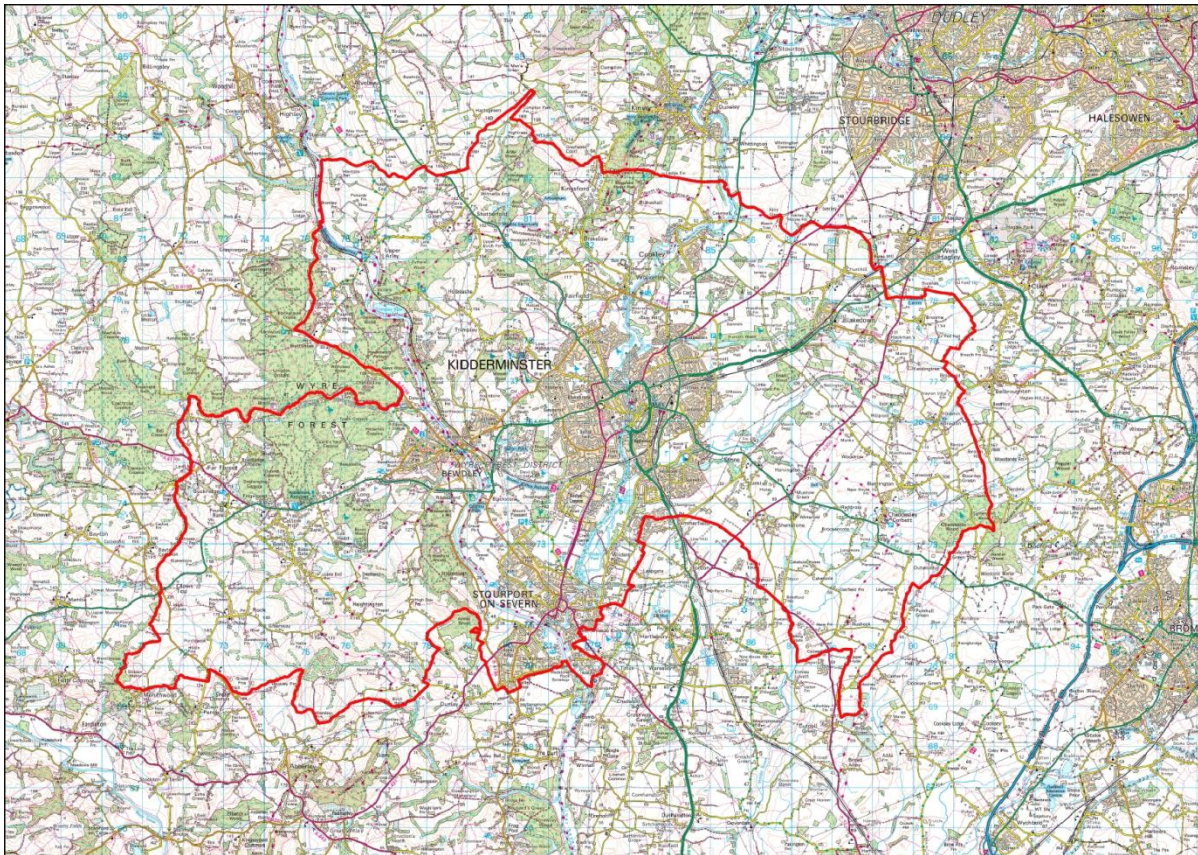
**AS AGREED BETWEEN**

**WYRE FOREST DISTRICT COUNCIL**

**AND**

**HISTORIC ENGLAND**

## **Wyre Forest District Council Boundary**



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### **1) Purpose**

1.1 The purpose of this Statement of Common Ground is to inform the Inspector and other parties about the areas of agreement between Wyre Forest District Council and Historic England on the following policies/issues contained within the Wyre Forest District Local Plan Pre-Submission Publication (2016-2036):

Table 2.0.1 – Issues highlighted in Preferred Options and Issues Options Consultation Documents (ref LPPS219)

Table 3.0.2 – Wyre Forest Development Plan – Aim and Objectives (ref LPPS220)

Paragraph 5.5 c (vi) – An environmental role (ref LPPS222)

Policy 6E – Role of Stourport-on-Severn and Bewdley as Market Towns (ref LPPS223)

Policy 26 – Safeguarding the Historic Environment (ref LPPS224)

Policy 31.2 – Lea Castle Village Principles of Development (ref LPPS225)

Policy 36.4 – Allotments, Upper Arley WA/UA/4 (ref LPPS226)

Note: The references refer to the unique reference within the Council's consultation database system.

## **2) Background**

- 2.1 Following Publication of the Preferred Options Document in 2017 there followed a series of negotiations between Wyre Forest District Council and Historic England's Historic Environment Planning Advisors, including a meeting on 19<sup>th</sup> March 2018 at which the development of the Heritage Impact Assessment was discussed. Historic England's representations of 4<sup>th</sup> April 2018 and comments arising from a further meeting held on 25<sup>th</sup> June 2018 were taken into account in the drafting of the Local Plan Pre-Submission Publication October 2018.
- 2.2 Historic England formally responded to the Pre-Submission Publication Consultation on 19<sup>th</sup> December 2018 and amendments were tabled following discussions at a meeting held on 13<sup>th</sup> May 2019 - prior to the re-opening of the Consultation on the Local Plan Pre-Submission Publication October 2018 and the Amendments to the Pre-Submission Publication (July 2019).
- 2.3 Historic England's response of 9<sup>th</sup> October 2019 referred to their previous objections about the soundness of the wording of policies set out at 1.1 above.
- 2.4 The Council has considered these representations and has discussed a number of proposed modifications to the policies referred to above with Historic England to address their objections.
- 2.5 Based on these discussions, agreement between the Council and Historic England has been reached on the modifications set out in Appendix 1 to this Statement of Common Ground (*as relevant text to be deleted shown as bold and strikethrough and new text to be inserted shown in bold italic*):

## **3) Areas of Common Ground**

- 3.1 Wyre Forest District Council and Historic England agree that:
  - The modifications proposed by Wyre Forest District Council stated in Appendix 1, (attached) address the concerns of Historic England.

## **4) Conclusion**

- 4.1 Based on the stated areas of common ground, Historic England agrees that the representations set out at paragraph 1.1 above to the Wyre Forest District Local Plan Pre-Submission Publication (2016-2036) have been addressed and can be withdrawn subject to the modifications stated above and set out in detail in Appendix 1 being made to the Plan.

**AGREEMENT**

Signed:

.....

On behalf of Wyre Forest District Council

.....

Rosamund Worrall  
On behalf of Historic England

<b>Respondent</b> Historic England (R. Worrall) [LPPS219]	<b>Agent</b>	<b>Element</b> – Table 2.0.1 – Issues highlighted in Preferred Options and Issues Options Consultation Documents	
<b>Issue</b>  The table continues to refer to ‘historic assets’. Following an earlier meeting as part of the Plan process we understood this was to be amended.		<b>Agreed change Modification:</b> Agree: Under heading Environmental Issues for Wyre Forest District: Revise bullet point: "Protecting, conserving and...." to read: <b><i>"Protecting, conserving and, where it is possible to do so, enhancing the District's rich natural environment and heritage assets"</i></b>	
<b>Respondent</b> Historic England (R. Worrall) [LPPS220]	<b>Agent</b>	<b>Element</b> - Table 3.0.2 – Wyre Forest Development Plan – Aim and Objectives	
<b>Issue</b>  Table 3.0.2 now includes Objective 8 for the historic environment which is generally welcomed. However, the objective does not refer to enhancement or setting so does not address requirements of the NPPF which would be necessary in order to demonstrate a positive approach to the historic environment.		<b>Agreed change Modification:</b> Agree: Revise Objective 8 to read: <b><i>‘To promote the historic environment and conserve or enhance the significance of heritage assets and their setting in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.’</i></b>	
<b>Respondent</b> Historic England (R. Worrall) [LPPS222]	<b>Agent</b>	<b>Element</b> - Paragraph 5.5 c (vi) – An environmental role	
<b>Issue</b>  Para 5.5 c(vi) does not refer to all heritage assets, e.g. Conservation Areas are not mentioned, or setting as part of the environmental role of the Plan. It is not clear why these are not included.		<b>Agreed change Modification:</b> Agree: Redraft paragraph 5.5 c (vi) to read: <b><i>"Protecting both undesignated and designated heritage assets and their settings"</i></b> .	
<b>Respondent</b> Historic England (R. Worrall) [LPPS223]	<b>Agent</b>	<b>Element</b> – Policy 6E – Role of Stourport-on-Severn and Bewdley as Market Towns	
<b>Issue</b>  Policy 6E regarding market towns would be more effective and demonstrate a positive approach to the historic environment within the Plan is a reference to the local historic environment was included. Text previously agreed at a meeting during the Plan process		<b>Agreed change Modification:</b> Agree: Add bullet point: <b><i>"Development within the towns Conservation Areas must preserve or enhance those areas, the heritage assets contained therein and their settings"</i></b> .	

does not appear to have been included in this iteration of the Plan.			
<b>Respondent</b> Historic England (R. Worrall) [LPPS224]	<b>Agent</b>	<b>Element</b> – Policy 26 – Safeguarding the Historic Environment	
<b>Issue</b>  We continue to object to the inclusion of a policy which indicates support for ‘enabling development’ in respect of the historic environment. A policy indicating support for heritage at risk, or the conservation or enhancement of heritage assets is a different matter but support for ‘enabling development’ could be misinterpreted.		<b>Agreed change Modification:</b> Agree: Omit reference to " <b>enabling development</b> ": Suggested amendment Policy 26 paragraph 4: " <b>The sympathetic and creative reuse and adaptation of historic buildings will be encouraged. Such proposals that provide a sustainable future for heritage assets identified as "at risk" will be considered in accordance with Policy 27A</b> ".	
<b>Respondent</b> Historic England (R. Worrall) [LPPS225]	<b>Agent</b>	<b>Element</b> Policy 31.2 – Lea Castle Village Principles of Development (ref LPPS225)	
<b>Issue</b>  The Lea Castle Village principles for development do not refer to the potential archaeology or recording of above ground assets as set out in the LPA’s site allocation heritage assessment work. It is noted that outline permission has been granted but this could expire and the requirements would not be clear since the policy makes no provision for the consideration of heritage assets but does for other matters.		<b>Agreed Change Modification:</b> Agree: In section Principles of Development add principle: (27) " <b>Recording of above ground heritage assets is required along with a further desk-based archaeological assessment to identify potential for archaeology and inform discussions about the scope and scale of any preservation and mitigation</b> ".	
<b>Respondent</b> Historic England (R. Worrall) [LPPS226]	<b>Agent</b>	<b>Element</b> Policy 36.4 – Allotments, Upper Arley WA/UA/4 (ref LPPS226)	
<b>Issue</b>  Typographical error – ‘Conservation’ instead of ‘Conservation Area’.		<b>Agreed Change Modification:</b> Agree: Amend Typo: 3. "..... <b>Conservation Area</b> ....."	